

## Knittel, Janette

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**From:** Goodman, Kathleen <kathleen.goodman@woodplc.com>  
**Sent:** Friday, May 08, 2020 11:53 AM  
**To:** Knittel, Janette; Thomas, Lee  
**Cc:** Young, William  
**Subject:** Container Properties/ Former Rhone Poulenc --Monthly Progress report, April 2020  
**Attachments:** 2020\_05\_10 Monthly Progress Report\_Sx.pdf

Greetings Janette--

Please find attached the PDF of the April 2020 Monthly Progress Report for the Container Properties/Formal Rhone-Poulenc site. Three hard copies will be mailed to you, Mr. Thomas and Ms. MacDonald when possible during this COVID-19 lockdown. Please forward this email to Ms. MacDonald, if you would be so kind, as I do not have her email address.

Please let me know if you have any questions.

Warm regards,

Kathleen

**Kathleen Goodman, LG.,LHg., RG.**

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**Prepared for:** Janette Knittel/EPA Region 10/OAW-150  
**Date:** **May 8, 2020**  
**Copies to:** Lee Thomas/EPA/OERA-140  
Jennifer MacDonald/EPA/ORC-113  
Project File





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**Prepared for:** Janette Knittel/EPA Region 10/AWT-150  
**Date:** May 8, 2020  
**Subject:** Monthly progress report – April 2020  
**Site name and location:** Former Rhone-Poulenc, Inc., Facility  
East Marginal Way, Tukwila, Washington  
**Reporting period:** April 1 through April 30, 2020

Wood Environment & Infrastructure Solutions, Inc. (Wood) prepared this progress report on behalf of the Respondents. This report summarizes pertinent, implemented, and planned Resource Conservation and Recovery Act corrective action activities at the former Rhone-Poulenc, Inc., facility located on East Marginal Way in Tukwila, Washington. This document is being transmitted to fulfill the monthly progress report requirement in U.S. Environmental Protection Agency (EPA) Region 10 Administrative Order on Consent No. 1091-11-20-3008(h) (the Order). The western portion of the site is referred to as the Insurance Auto Auctions, Inc. (IAAI), Lease Parcel.

## Activities completed or in progress for this reporting period

### Progress report

The March 2020 monthly progress report required under the Order was sent to EPA on Thursday April 9, 2020, via email. Hard copies were mailed on April 21, 2020.

### King County self-monitoring sampling and reporting

The first quarter self-monitoring report was sent to the King County Industrial Wastewater division on Monday, April 9, 2020. The second quarter self-monitoring sampling is scheduled for early June 2020.

### Interim and corrective measures

This section summarizes key activities performed related to implementation of the hydraulic control interim measure (HCIM).

### Performance monitoring

The Round 87 Performance Monitoring report is in preparation and will be submitted to the EPA by May 29, 2020.

### Hydraulic control

The pre-treatment system operated under automatic control from April 1 to April 30, 2020. Water level data was downloaded from both the data recorder and the programmable logic controller (PLC) on May 1, 2020.

The differential between average water levels in well DM-8 and MW-49 was maintained at more than 1 foot from April 1 to April 30, 2020 and was approximately 2.08 feet at the end of April 2020. We will continue to



report flow using the totalized flow from the individual extraction wells due to a slight undercount of flow by the effluent flow meter.

Wood continued to troubleshoot the autodialer during April 2020. The telecommunications service provider determined that the telephone line had broken in an off-site manhole. The broken line is scheduled to be repaired in May 2020.

There is ongoing slow leakage from the EX-3 piping that interferes with automatic operation of EX-3 with the well shutting down due to lack of flow when EX-3 is activated. Any leakage from the EX-3 conveyance piping will be contained within the barrier wall.

### **Corrective measures study**

The Agency Draft Corrective Measures Study (CMS) Work Plan was delivered to EPA on September 2, 2014. As of the end of April 2020, the Respondents are still awaiting EPA's comments on the Agency Draft CMS Work Plan. See the sections below for details concerning the CO<sub>2</sub> Neutralization Pilot Study (CO<sub>2</sub> Pilot Study).

### **CO<sub>2</sub> pilot study**

We are currently planning on compiling the results of the CO<sub>2</sub> Pilot Study and submitting to EPA by May 15, 2020.

### **Activities planned for next reporting period**

Various activities associated with the IAAI Lease Parcel will continue during the next reporting period. During May 2020, the Respondents plan to:

- Continue regularly-scheduled operations and maintenance activities associated with the HCIM;
- Continue working on the Round 87 Performance Monitoring report;
- Continue working on the CO<sub>2</sub> Pilot Study report; and
- Await EPA's forthcoming comments on the CMS Work Plan, if any.



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On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this report, Monthly Progress Report – April 2020, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By:   
Kathleen Goodman, Project Coordinator

Date: May 8, 2020

